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GOOGLE LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO**

ANIBAL RODRIQUEZ, *et al.*, individually and on
behalf of all other similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 3:20-CV-04688 RS

**DECLARATION OF EDUARDO E.
SANTACANA IN SUPPORT OF
DEFENDANT GOOGLE LLC'S REPLY
IN SUPPORT OF MOTION TO
DISMISS FIRST AMENDED
COMPLAINT**

Court: Courtroom 3 – 17th Floor
Date: March 4, 2021
Time: 1:30 p.m.
Judge: Hon. Richard Seeborg

1 I, Eduardo E. Santacana, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California. I am a
3 partner at the law firm of Willkie Farr & Gallagher LLP, counsel of record for Google LLC in
4 the above-captioned matter. I have personal knowledge of the facts set forth below and, if called
5 as a witness in a court of law, could and would testify competently thereto.

6 2. Attached hereto as **Exhibit A** is a true and correct copy of the Firebase SDK Log
7 User Actions web page, with an effective date of February 1, 2021, which was downloaded on
8 February 4, 2021 at: <https://firebase.google.com/docs/app-indexing/android/log-actions>. A true
9 and correct copy of a historical exemplar of this same page from May 2017, containing
10 substantially similar content, is available at:
11 [https://web.archive.org/web/20170517210409/https://firebase.google.com/docs/app-](https://web.archive.org/web/20170517210409/https://firebase.google.com/docs/app-indexing/android/log-actions)
12 [indexing/android/log-actions](https://web.archive.org/web/20170517210409/https://firebase.google.com/docs/app-indexing/android/log-actions).

13 3. Attached hereto as **Exhibit B** is a true and correct copy of the Safeguarding your
14 data web page, which was downloaded on February 4, 2021 at
15 <https://support.google.com/analytics/answer/6004245>.

16 I declare under the penalty of perjury that the foregoing is true and correct. Executed on
17 February 4, 2021.

18 By: /s/ Eduardo E. Santacana
19 Eduardo E. Santacana
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